

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

LATERAL RECOVERY LLC, BENCHMARK,
BULIDERS, INC., FTE NETWORKS, INC.,
JUS-COM LLC and FOCUS WIRELESS, LLC,

Civil Action No.: 1:22-cv-02170

Plaintiffs,

-against-

FUNDERZ.NET, LLC d/b/a HOP CAPITAL
and d/b/a BUSINESS MERCHANT FUNDING,
JOSEPH YITZCHAKOV a.k.a JOSEPH
ISAACOV, GAVRIEL YITZCHAKOV
a.k.a. GABE ISAACOV, and JOHN and JANE
DOE INVESTORS,

Defendants.

**MOTION TO APPEAR *PRO HAC VICE* FOR
HOWARD W. FOSTER, ESQ.**

Pursuant to Rule 1.3 of the Local Rules of the United States District Court for the Southern District of New York, Howard W. Foster, Esq., hereby moves this Court for an Order for admission to practice *Pro Hac Vice* to appear as counsel for Defendants, Funderz.net, LLC d/b/a Hop Capital and d/b/a Business Merchant Funding and Joseph Yitzchakov a/k/a Joseph Isaacov, in the above captioned action.

A Declaration in support of this motion is being filed contemporaneously herewith and Mr. Foster's Certificate of Good Standing issued within the past 30 days are attached thereto as **Exhibit A**.

Dated: January 23, 2023.

Respectfully submitted,

By: /s/Steven W. Wells
Steven W. Wells

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